

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

v.

TALYA A. LUBIT,

Defendant.

Case No.: 2:24-CR-00257

MOTION TO FILE DOCUMENTS UNDER SEAL

Talya Lubit, through her counsel, Jennifer H. Bouriat, files the following unopposed motion to file objections and clarifications to the Presentence Investigation Report under seal, and states as follows:

1. Objections to the Presentence Investigation Report are due August 13, 2025. (ECF 156)
2. Ms. Lubit intends to file objections to the Presentence Investigation Report to clarify information in it related to her medical treatment.
3. To avoid the disclosure of this confidential and sensitive information, Ms. Lubit requests entry of an Order permitting her to file her Objections to the Presentence Investigation Report under seal.
4. Ms. Lubit further requests that this document remain under seal permanently.
5. It is in the interest of justice that this motion be granted.
6. The government will not be prejudiced by the granting of this motion because counsel for the government will receive unredacted versions of the document filed under seal.

7. Undersigned counsel contacted counsel for the government about this motion and the government consents to the of filing of this document under seal.

WHEREFORE, undersigned counsel, on behalf of defendant Talya Lubit, respectfully requests that this Court permit Ms. Lubit to file objections to her Presentence Investigation Report under seal.

Respectfully submitted:

/s/ Jennifer H. Bouriat
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